

Ahilan T. Arulanantham (SBN 237841)
arulanantham@law.ucla.edu
Stephany Martinez Tiffer (SBN 341254)
martinezstiffer@law.ucla.edu
CENTER FOR IMMIGRATION LAW AND
POLICY, UCLA SCHOOL OF LAW
385 Charles E. Young Dr. East
Los Angeles, CA 90095
Telephone: (310) 825-1029

Emilou MacLean (SBN 319071)
emaclean@aclunc.org
Michelle (Minju) Y. Cho (SBN 321939)
mcho@aclunc.org
Amanda Young (SBN 359753)
ayoung@aclunc.org
ACLU FOUNDATION
OF NORTHERN CALIFORNIA
39 Drumm Street
San Francisco, CA 94111-4805
Telephone: (415) 621-2493
Facsimile: (415) 863-7832

Attorneys for Plaintiffs
[Additional Counsel Listed on Next Page]

Yaakov M. Roth
Acting Assistant Attorney General
Civil Division
Drew Ensign
Deputy Assistant Attorney General
Sarah L. Vuong (CA Bar 258528)
Assistant Director
William H. Weiland (MA Bar 661433)
Senior Litigation Counsel
Lauren Bryant (NY Bar 5321880)
Anna Dichter (NJ Bar 304442019)
Jeffrey Hartman (WA Bar 49810)
Luz Maria Restrepo (NY Bar 4907077)
Catherine Ross (DC Bar 9007404)
Amanda Saylor (FL Bar 1031480)
Eric Snyderman (VA Bar 99563)
Trial Attorneys
U.S. Department of Justice, Civil Division
Office of Immigration Litigation
General Litigation and Appeals Section
P.O. Box 868, Ben Franklin Station
Washington, DC 20044

Attorneys for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, MARIELA
GONZÁLEZ, FREDDY JOSE ARAPE RIVAS,
M.H., CECILIA DANIELA GONZÁLEZ
HERRERA, ALBA CECILIA PURICA
HERNÁNDEZ, E.R., HENDRINA VIVAS
CASTILLO, A.C.A., SHERIKA BLANC, VILES
DORSAINVIL, and G.S.,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY, and UNITED STATES OF
AMERICA,

Defendants.

Case No. 3:25-cv-01766-EMC

**STIPULATION REGARDING MOTION
TO DISMISS AND CROSS SUMMARY
JUDGMENT MOTION BRIEFING
SCHEDULING AND ~~PROPOSED~~ ORDER**

Assigned to: Hon. Edward M. Chen

Complaint filed: February 19, 2025

1 Additional Counsel for Plaintiffs

2 Jessica Karp Bansal (SBN 277347)
jessica@ndlon.org

3 Lauren Michel Wilfong (*Pro Hac Vice*)
lwilfong@ndlon.org

4 NATIONAL DAY LABORER
ORGANIZING NETWORK

5 1030 S. Arroyo Parkway, Suite 106
Pasadena, CA 91105

6 Telephone: (626) 214-5689

7 Eva L. Bitran (SBN 302081)
ebitran@aclusocal.org

8 ACLU FOUNDATION
OF SOUTHERN CALIFORNIA

9 1313 West 8th Street
Los Angeles, CA 90017

10 Telephone: (213) 977-5236

11 Erik Crew (*Pro Hac Vice*)
ecrew@haitianbridge.org

12 HAITIAN BRIDGE ALLIANCE
4560 Alvarado Canyon Road, 1H

13 San Diego, CA 92120

14 Telephone: (949) 603-7411

Pursuant to Civ. L.R. 6-2 and 7-12, the parties, by and through their respective counsel, submit this stipulation regarding the due date for Plaintiffs' Motion for Summary Judgment and the briefing schedule for Defendants' Motion to Dismiss.

WHEREAS, on April 29, 2025, Defendants filed a Motion to Dismiss. Dkt. 122;

WHEREAS, the hearing on Defendants' Motion to Dismiss was initially set for June 12, 2025, with Plaintiffs' Opposition due May 13, 2025, and Defendants' Reply due by May 20, 2025;

WHEREAS, on May 5, 2025, this Court *sua sponte* rescheduled the hearing on Defendants' Motion to Dismiss from June 12, 2025 to July 11, 2025;

WHEREAS, on April 30, 2025, this Court set a briefing schedule for the Parties' Cross Motions for Summary Judgment pursuant to the Parties' stipulation, which inadvertently set May 26, 2025, Memorial Day, as the due date for Plaintiffs' Motion for Summary Judgment. Dkt. 124;

WHEREAS, the parties respectfully request that the Court grant the following stipulated briefing schedule for the parties' forthcoming Motion to Dismiss briefing and Plaintiffs' forthcoming Motion for Summary Judgment.

IT IS HEREBY STIPULATED AND AGREED, by the parties and subject to the approval of the Court:

- Plaintiffs shall file their Motion for Summary Judgment by May 27, 2025.
- Plaintiffs shall file their Opposition to Defendants' Motion to Dismiss by May 28, 2025.
- Defendants shall file their Reply in Support of their Motion to Dismiss by June 10, 2025.
- The briefing schedule for the parties' Summary Judgment Motions will otherwise remain the same.

IT IS SO STIPULATED.

Respectfully submitted,

1 Date: May 9, 2025

ACLU FOUNDATION
OF NORTHERN CALIFORNIA

2 /s/ Emilou MacLean

3 Emilou MacLean

Attorneys for Plaintiffs

4 Date: May 9, 2025

U.S. DEPARTMENT OF JUSTICE

5 /s/ Sarah L. Vuong

6 Sarah L. Vuong

Attorneys for Defendants

7
8 **SIGNATURE ATTESTATION**

9 Pursuant to Civil Local Rule 5-1(i)(3), I hereby attest that each of the other Signatories have
10 concurred in the filing of this document.

11
12 ACLU FOUNDATION
13 OF NORTHERN CALIFORNIA


14 /s/ Emilou MacLean

15 Emilou MacLean

16
17 **~~PROPOSED~~ ORDER**

18 PURSUANT TO STIPULATION, IT IS SO ORDERED.

19
20 Dated: May 9, _____, 2025

21 
The Honorable Edward M. Chen
United States District Judge